

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Newport News Division

UNITED STATES OF AMERICA	)	CRIMINAL NO. 4:18cr <u>93</u>
	)	
v.	)	18 U.S.C. §§ 1030(a)(4), (c)(3)(A)
	)	Computer Fraud
MICHELLE M. HOLT,	)	(Count One)
	)	
Defendant.	)	18 U.S.C. § 641
	)	Theft of Government Property
	)	(Count Two)
	)	
	)	Forfeiture

CRIMINAL INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

From in or about January 2002, through in or about June 2018, in the Eastern District of Virginia, MICHELLE M. HOLT, the defendant herein, knowingly and with the intent to defraud, accessed a protected computer without authorization and exceeded authorized access, and by means of such conduct furthered the intended fraud and obtained something of value other than use of the computer, to wit: The defendant, a civilian employee of the United States Air Force, improperly accessed and misused the Defense Civilian Personnel System (DCPS) of the United States Department of Defense to fraudulently alter pay records to her benefit, resulting in approximately \$1,460.262.43 in losses to the United States resulting from fraudulently obtained overtime pay, holiday premium pay, and annual leave and sick leave reversals.

(In violation of Title 18, United States Code, Sections 1030(a)(4) and (c)(3)(A)).

COUNT TWO

THE UNITED STATES ATTORNEY CHARGES THAT:

From in or about January 2002, through in or about June 2018, in the Eastern District of Virginia, MICHELLE M. HOLT, the defendant herein, did willfully and knowingly steal, purloin and knowingly convert to her own use property belonging to the United States and of an aggregate value in excess of \$1,000.00, to wit: The defendant, a civilian employee of the United States Air Force, improperly accessed and misused the Defense Civilian Personnel System (DCPS) of the United States Department of Defense to fraudulently alter pay records to her benefit, resulting in approximately \$1,460,262.43 in losses to the United States resulting from fraudulently obtained overtime pay, holiday premium pay, and annual leave and sick leave reversals.

(In violation of Title 18, United States Code, Section 641).

FORFEITURE

1. The defendant, if convicted of any of the violations alleged in this information, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.
2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).
3. The property subject to forfeiture includes, but is not limited to:
  - a. A monetary judgment in the amount of not less \$1,460,262.43, representing the amount the defendant obtained as a result of Counts One and Two.

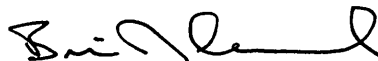
(In accordance with Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B); and Title 28, United States Code, Section 2461.)

United States v. Michelle M. Holt  
Criminal Action 4:18cr 93

Respectfully submitted,

G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY

By:



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